

PATENT
60709-00008

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Starkman

Serial No.: 09/751,812

Filed: December 29, 2000

For: METHODS AND SYSTEMS
FOR A COLLECTIONS MODEL
FOR LOANS

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: Art Unit: 3624
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: Examiner: Lalita M. Hamilton
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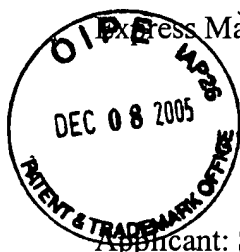
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- Comments of Statement of Reasons for Allowance (2 pgs.)
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Respectfully submitted,

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Examiner: Lalita M. Hamilton

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313

Sir:

The following comments are in response to the Examiner's Statement of Reasons for Allowance in the Notice of Allowability dated November 23, 2005.

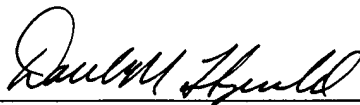
Applicant respectfully disagrees with the Examiner's Statement of Reasons for Allowance because such statement may have unintentionally introduced some ambiguities in what was otherwise a very concise and thorough examination of the Claims of this patent application. The Examiner recites in the Reasons for Allowance what she believes is taught by McCauley U.S. Patent No. 6,067,533. Applicant respectfully submits that Applicant does not necessarily agree with what the Examiner has recited as to what is taught by this reference. Rather, Applicant believes the record as a whole should be considered.

The Examiner further notes in the Reasons for Allowance that McCauley does not teach "utilizing the collections model to predict payments made by borrowers of each loan included within the portfolio, the collections model is based on historical payment information of the borrower, a plurality of collection strategies that may be utilized for collecting payment from the borrower, and the delinquency category assigned to the loan; comparing payments received during a current month for each loan to the delinquency category assigned to each corresponding loan and the predicted payments for each corresponding loan; comparing payments received for

each loan during the current month to the prior month's payment category of the corresponding loan; incorporating management feedback into expectations of future performance wherein management feedback includes recommending a change in collection strategies used for prompting payment from each borrower associated with each loan included within the portfolio and predicting future payment performance of each borrower based on the recommended change in collection strategies; and updating the collections model stored within the computer system based on the payment comparisons and the management feedback, the updated collections model predicts future cash inflows for each loan included within the portfolio, the updated collections model is configured to apply a greater weight to the payment performance of each loan for the current month as compared to the payment performance of each loan for prior months." While Applicant believes that the claims are allowable, Applicant does not acquiesce that patentability resides in these features recited in the Reasons for Allowance. Rather, Applicant respectfully submits that the claims are allowable because the independent claims recite the above-noted recitation in combination with other recitations included in the independent claims.

Also, reasons for allowance are only warranted in instances in which the record of the prosecution as a whole does not make clear the Examiner's reasons for allowing a claim or claims (see 37 CFR §1.104(e)). In the present case, Applicant believes the record as a whole does make the reasons for allowance clear and therefore no statement by the Examiner is necessary or warranted.

Respectfully submitted,



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